

EXHIBIT C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)
---	----------------------

This document relates to:

Alexander Jimenez, et al. v. Islamic Republic of Iran, No. 1:18-cv-11875 (GBD) (SN)

DECLARATION OF FAMILIAL RELATIONSHIP

I, Jaimelin Taveras, declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. My name is Jaimelin Taveras, and I am the stepdaughter of Manuel De Jesus Molina (“Manuel”), who died on September 11, 2001 (“9/11”) when the World Trade Center collapsed. I submit this Declaration to demonstrate I am the functional equivalent of Manuel’s daughter.
2. Manuel De Jesus Molina came into my life in approximately 1992 when he started dating my mother when I was 1 year old. Manuel and I (and the rest of our immediate family) lived together as a family at 3407 Dekalb Avenue in the Bronx from 1995 until his tragic death, along with Manuel’s cousin Maria Perez who lived with us for 5 years as well. My mother and Manuel were legally married on April 9, 2000.
3. My mother was disabled and Manuel supported our family and took care of me, my sisters, and my mother. Manuel was the sole wage earner for my family prior to his death. Due to my mom’s disability (she can only ambulate with a wheelchair or crutches), Manuel had an outsized role in my home and my upbringing. Manuel was my primary caregiver. He bought me birthday and Christmas presents, and I never wanted for anything. He would take us to the park, on regular weekend trips to Manhattan to visit my grandmother (his mother) and my aunt (his sister) who lived two doors down, he attended our school events and medical appointments,

he cooked small meals for us, helped me get dressed, and played with us at home. In addition to financial support, Manuel treated me like his daughter, both emotionally and socially, and made our family whole. *See* photos attached as Exhibit 1. Manuel was a true family person.

4. Manuel was very supportive with my schooling. I have a particular memory of Manuel always helping with my math and reading. I attended special education classes at P.S. 94 in the Bronx, and he assisted me with my homework almost every night.

5. One of my fondest memories of Manuel relates to my fifth grade “senior trip.” It cost \$40 and my mom said that we didn’t have the money and, therefore, I couldn’t go. I was devastated as all my school friends were going. The morning of the trip, Manuel surprised me and told me he found the funds for the trip plus a little extra for lunch. We raced to school so that I could make the trip. I was so excited that I was able to go on the trip to Connecticut. I remember coming home and exclaiming to my parents how fantastic the day was. It would not have happened without Manuel.

6. I remember traveling to Manuel’s birthplace in the Dominican Republic almost every summer. We would visit with his parents, brothers and sisters, and cousins and their dozens of roosters. His family treated me like his daughter. Manuel taught me how to ride a bike in the summer of 2001 on one of those trips. I fell down a lot and he was always there to pick me up and encourage me to keep trying. By the end of the summer, he had successfully taught me how to ride a bike. This was the last family trip we had together before he was killed.

7. Since Manuel’s death, I underwent grief counseling at Montefiore Hospital for approximately one year.

8. There is no doubt Manuel was my father. He served as a guardian and would take care of me financially, physically, and emotionally. He always made sure that our family had everything we needed.

9. In contrast, I have no relationship with my biological father who left our family for the Dominican Republic in approximately 1991 and I haven't spoken to him in decades. I refer to Manuel as the grandfather of my 3 young children and had a tattoo inked in Manuel's honor with his name on my back. My oldest son, Raynel Manuel Puello, is named after his grandfather whom he never met.

10. 9/11 ripped our family apart. My family and I have been devasted by the death of our father, Manuel. I have such wonderful memories of him, but I would give anything to have had more time with him in my life.

11. Manuel and I had a very close relationship akin to a father and daughter and we considered each other to be father and daughter in every way. Accordingly, I should be deemed the functional equivalent of Manuel's daughter.

Executed on: May 17, 2024

Name (Signature): Jaimelin Taveras

Name (Print): Jaimelin Taveras

EXHIBIT 1









